

# EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SOUTH FERRY BUILDING COMPANY, a New  
York limited partnership, EMANUEL GETTINGER,  
ABRAHAM WOLFSON, and ZEV WOLFSON,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04488 (SMB)

**STIPULATION FOR ENTRY OF SCHEDULING ORDER**

**WHEREAS**, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, and defendants South Ferry Building Company, Emmanuel Gettinger, Abraham Wolfson, and Zev Wolfson (“Defendants, and together with the Trustee, the “Parties”), by and through their respective counsel, and consistent with the authorization provided by the Court at the January 25, 2017 pretrial conference permitting the Parties to file summary judgment motions

pursuant to Local Bankruptcy Rule 7056, met and conferred regarding the following schedule.

**IT IS THEREFORE MUTUALLY AGREED AND STIPULATED**, by and between the Trustee and Defendants as follows:

1. The deadline for the Parties to file a joint statement of undisputed facts is March 10, 2017.
2. The deadline for the Parties to file their respective Motions for Summary Judgment (the “Motions”) will be 45 days after the Court approves the joint statement of undisputed facts.
3. The deadline for the Parties to file oppositions to the Motions will be 45 days after the deadline for filing the Motions.
4. The deadline for the Parties to file replies to the oppositions to the Motions will be 30 days after the deadline for filing oppositions to the Motions.
5. Oral argument on the Motions will be heard on a date to be set by the Court.
6. Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and no rights or defenses are waived by entering into this Stipulation.

Dated: January 25, 2017  
New York, New York

**BAKER & HOSTETLER LLP**

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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

**BAKER & MCKENZIE LLP**

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Richard A. Kirby  
Laura K. Clinton

*Attorneys for Defendants*

SO ORDERED this 26th day of January, 2017

/s/ Stuart M. Bernstein  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE





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\*\* In cooperation with  
Trench, Rossi e Watanabe  
Advogados

VIA ECF AND EMAIL

July 7, 2017

The Hon. Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004

**SIPC v. BLMIS, Adv. Pro. Nos. 10-4488, 10-4350, 10-5110**

Dear Judge Bernstein:

We represent the South Ferry, South Ferry 2, and Mesora defendants in the matter referenced above. Our clients are preparing to file a joint summary judgment motion and related memorandum.

We respectfully request permission for these defendants to file an overlength brief. This moving brief would exceed the 40-page limit specified in your chamber rules by no more than 10 pages. The increase to 50 pages is necessary to adequately address the legal arguments and distinct facts raised by three different defendants who are filing a joint dispositive motion.

Counsel for the Trustee consents to this request, provided that the Trustee is allotted the same number of pages. The defendants have no objection to the Trustee filing up to a 50-page combined motion for summary judgment.

The Trustee also requests that the July 17, 2017 filing deadline for the summary judgment motions be extended to July 21, 2017. The defendants have no objection to the Trustee's request for additional time and will file their own motions based on the revised schedule.

*Granted*  
*SMB*  
*7/11/17*

**Baker  
McKenzie.**

Unless the court otherwise directs, the parties will proceed as outlined above with respect to the motions for summary judgment.

Respectfully,

*/s/ Richard A. Kirby*

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Cc: Nicholas Cremona  
Keith Murphy  
Maximillian Shifrin